



Chevron

May 23, 2001

Chevron Products Company
P. O. Box 1272
Richmond, CA 94802-0272

J.W. Hartwig
Manager
Environmental and Safety Division
510 242 1400

Ms. L. Barsamian
Executive Officer
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Attention: Keyvan Moghbel

Request For Compliance Schedule and Demonstration of Infeasibility To Achieve Immediate Compliance With Calculated Effluent Limitation

Dear Ms. Barsamian:

Chevron is submitting a *"Request For Compliance Schedule And Demonstration of Infeasibility To Achieve Immediate Compliance With Calculated Effluent Limitation"* for a number of pollutants potentially subject to final Water Quality-Based Effluent Limits in Chevron's Tentative Order issued in April 2001.

In addition, Chevron is submitting a *"Request For Schedule Of Interim Requirements And Demonstration Of Necessity Based On Insufficient Data To Calculate A Final Effluent Limitation For Cyanide Or, In The Alternative, Request For Compliance Schedule And Demonstration Of Infeasibility To Achieve Immediate Compliance With Calculated Effluent Limitation For Cyanide."* Chevron believes that there is insufficient data to establish a final water quality based effluent limit for cyanide and, on that basis, has requested a schedule of interim requirements for data collection. Chevron has also requested that the Regional Board initiate the process of developing a site-specific objective for cyanide. Although we believe these two actions should be taken to address cyanide instead of establishing final effluent limits, in recognition of the staff's May 23 deadline, we have also submitted a request for compliance schedule and demonstration of infeasibility. We ask that the Regional Board consider and adopt that request only if it decides not to grant Chevron's request for interim requirements for data collection and development of a site-specific objective.

As you know, Chevron has raised a number of objections and concerns in its initial comments on the Tentative Order, and those concerns remain notwithstanding this submittal. For example, by submitting these requests, Chevron does not waive its objections to the inclusion of effluent limits for dioxin or pesticides in its NPDES permit.

Thank you for your consideration of our requests. If you have any questions, please contact Mr. Rich Sandman at (510) 242-5017.

Sincerely,

A handwritten signature in black ink that reads "Jeff Hartwig". The signature is written in a cursive, flowing style.

cc: San Francisco Bay Regional Water Quality Control Board Members
Mr. Arthur G. Baggett, State Water Resources Control Board
Mr. Ed Anton, State Water Resources Control Board
Mr. Larry Kolb - RWQCB
Mr. Keyvan Moghbel - RWQCB
Mr. Greg Walker - RWQCB
Mr. Teng-Chung Wu - RWQCB
Ms. Shin-Roei Lee - RWQCB